

EXHIBIT K

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

MDL No. 1570 (RCC)

This document relates to:

KATHLEEN ASHTON, et al,
Plaintiffs,

02 CV 6977 (RCC)

v.

AL QAEDA ISLAMIC ARMY, et al.,
Defendants.

**DEFENDANT MUSLIM WORLD LEAGUE'S
ANSWER TO THIRD AMENDED COMPLAINT AND CROSS CLAIM**

Defendant Muslim World League ("MWL"), through undersigned counsel, and pursuant to Rule 12, Fed. R. Civ. P., hereby submits its Answer to the Plaintiffs' Third Amended Complaint ("Complaint").

1. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 1.
2. MWL denies that this court has subject matter jurisdiction over MWL.
3. MWL denies that venue is proper in this district.
4. MWL denies that jurisdiction over plaintiffs' claims against MWL is proper under 28 U.S.C. §§ 1605(a)(5) and 1605(a)(7), because those provisions apply to actions against foreign states.

DEFENDANTS

5. MWL denies the allegations in paragraph 5 insofar as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 5.

6. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 6.

7. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 7.

8. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 8.

9. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 9.

10. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 10.

11. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 11.

12. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 12.

13. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 13.

14. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 14.

15. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 15.

16. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 16.

17. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 17.

18. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 18.

19. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 19.

20. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 20.

21. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 21.

22. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 22.

23. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 23.

SUMMARY OF ALLEGATIONS

24. MWL denies the allegations in paragraph 24 insofar as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 24.

25. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 25.

26. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 26.

27. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 27.

28. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 28.

29. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 29.

30. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 30.

31. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 31.

32. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 32.

THE BIRTH OF AL QAEDA

33. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 33.

34. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 34.

35. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 35.

36. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 36.

37. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 37.

38. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 38.

39. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 39.

40. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 40.

41. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 41.

42. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 42.

43. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 43.

44. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 44.

45. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 45.

46. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 46.

THE SUDAN

47. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 47.

48. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 48.

49. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 49.

50. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 50.

51. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 51.

52. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 52.

53. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 53.

54. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 54.

55. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 55.

56. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 56.

57. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 57.

58. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 58.

59. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 59.

60. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 60.

61. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 61.

62. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 62.

63. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 63.

64. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 64.

65. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 65.

66. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 66.

67. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 67.

68. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 68.

69. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 69.

70. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 70.

71. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 71.

72. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 72.

73. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 73.

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75. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 75.

76. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 76.

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78. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 78.

79. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 79.

80. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 80.

81. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 81.

82. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 82.

83. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 83.

84. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 84.

85. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 85.

86. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 86.

87. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 87.

88. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 88.

The Agencies and Instrumentalities of the Republic of Sudan

89. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 89.

90. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 90.

91. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 91.

92. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 92.

IRAQI TERRORISM

93. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 93.

94. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 94.

95. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 95.

96. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 96.

THE 1993 WTC BOMBING

97. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 97.

98. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 98.

99. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 99.

100. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 100

101. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 101.

102. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 102.

103. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 103.

104. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 104.

105. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 105.

106. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 106.

107. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 107.

108. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 108.

SOMALIA

109. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 109.

1994-1996

110. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 110.

111. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 111.

112. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 112.

RETURN TO AFGHANISTAN

113. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 113.

114. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 114.

115. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 115.

IRAQI AND AL QAEDA INTERESTS PUBLICLY MERGE

116. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 116.

117. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 117.

118. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 118.

119. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 119.

120. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 120.

121. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 121.

122. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 122.

123. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 123.

124. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 124.

125. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 125.

126. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 126.

127. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 127.

128. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 128.

U.S. EMBASSY BOMBINGS

129. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 129.

130. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 130.

131. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 131.

132. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 132.

133. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 133.

134. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 134.

135. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 135.

136. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 136.

137. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 137.

THE 1998 U.S. AIR STRIKES ON AL QAEDA

138. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 138.

139. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 139.

140. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 140.

141. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 141.

142. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 142.

143. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 143.

144. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 144.

145. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 145.

146. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 146.

147. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 147.

148. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 148.

MILLENIUM PLOT

149. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 149.

150. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 150.

ATTACK ON U.S.S. COLE

151. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 151.

152. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 152.

153. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 153.

154. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 154.

AL QAEDA – SAUDI HIJACKING

155. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 155.

156. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 156.

157. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 157.

IRAQI THREATS

158. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 158.

159. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 159.

160. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 160.

161. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 161.

IRAQI FORE-KNOWLEDGE OF THE SEPTEMBER 11th ATTACKS

Al Nasiriyah News Articles

162. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 162.

163. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 163.

164. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 164.

165. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 165.

166. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 166.

167. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 167.

168. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 168.

169. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 169.

170. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 170.

PREPARATION FOR SEPTEMBER 11th ATTACKS

171. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 171.

172. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 172.

173. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 173.

174. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 174.

175. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 175.

176. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 176.

177. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 177.

178. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 178.

179. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 179.

180. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 180.

181. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 181.

182. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 182.

SEPTEMBER 11th ATTACKS

183. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 183.

184. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 184.

185. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 185.

186. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 186.

187. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 187.

188. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 188.

POST SEPTEMBER 11th

189. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 189.

190. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 190.

191. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 191.

192. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 192.

193. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 193.

194. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 194.

195. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 195.

196. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 196.

197. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 197.

IRAN

198. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 198.

199. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 199.

200. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 200.

201. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 201.

202. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 202.

203. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 203.

204. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 204.

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206. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 206.

207. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 207.

208. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 208.

209. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 209.

210. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 210.

211. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 211.

212. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 212.

213. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 213.

214. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 214.

215. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 215.

216. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 216.

217. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 217.

218. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 218.

219. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 219.

220. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 220.

HAMBURG AL QAEDA CELL

221. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 221.

222. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 222.

223. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 223.

224. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 224.

225. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 225.

226. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 226.

227. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 227.

228. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 228.

229. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 229.

230. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 230.

231. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 231.

232. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 232.

233. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 233.

234. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 234.

235. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 235.

236. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 236.

237. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 237.

238. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 238.

239. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 239.

240. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 240.

241. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 241.

242. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 242.

243. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 243.

244. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 244.

245. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 245.

246. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 246.

247. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 247.

248. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 248.

249. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 249.

SAUDI ARABIAN DEFENDANTS

250. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 250.

251. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 251.

252. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 252.

253. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 253.

254. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 254.

255. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 255.

256. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 256.

257. MWL denies the allegations in paragraph 257 insofar as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 257.

258. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 258.

259. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 259.

260. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 259.

261. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 261.

262. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 262.

263. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 263.

264. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 264.

265. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 265.

266. MWL denies the allegations in paragraph 266 insofar as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 266.

267. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 267.

268. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 268.

269. MWL denies the allegations in paragraph 269 insofar as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 269.

270. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 270.

271. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 271.

272. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 272.

273. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 273.

274. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 274.

275. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 275.

276. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 276.

277. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 277.

278. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 278.

279. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 279.

280. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 280.

281. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 281.

282. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 282.

283. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 283.

284. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 284.

285. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 285.

286. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 286.

287. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 287.

288. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 288.

289. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 289.

290. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 290

291. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 291.

292. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 292.

293. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 293.

294. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 294.

295. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 295.

296. MWL denies the allegations in paragraph 296 insofar as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 296.

297. MWL denies the allegations in paragraph 297 insofar as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 297.

THE MUSLIM WORLD LEAGUE

298. MWL admits that it was founded in 1962. MWL admits that it serves as the umbrella organization for the International Islamic Relief Organization.

299. MWL admits that it is funded, in part, by the government of the Kingdom of Saudi Arabia. MWL admits that Arafat El- Ashi was employed in MWL's Canada office. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 299.

300. MWL admits it maintains an office at 134 West 26th Street, New York, NY, and that its office located at 360 S. Washington Street, in Falls Church, Virginia, was raided by law enforcement in March 2002. MWL admits that Abdullah al Obaid is an officer of the MWL entity in Virginia. Otherwise, MWL denies the allegations in paragraph 300 insofar as they relate to MWL.

301. MWL admits that Abdullah al Obaid is an officer of the MWL entity in Virginia. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 301.

302. MWL denies the allegations in paragraph 302 insofar as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 302.

303. MWL denies the allegations in paragraph 303 insofar as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 303.

304. MWL admits that Wael Jalaiden worked for MWL in Peshawar, Pakistan. MWL denies the allegations in paragraph 304 as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 304.

305. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 305.

306. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 306.

307. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 307.

308. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 308.

309. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 309.

INTERNATIONAL ISLAMIC RELIEF ORGANIZATION

310. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 310

311. MWL denies the allegations in paragraph 311 insofar as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 311.

312. MWL admits that Wael Jalaidan was employed by MWL in Peshawar, Pakistan. MWL denies the allegations in paragraph 312 insofar as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 312.

313. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 313.

314. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 314.

315. MWL denies the allegation in paragraph 315 insofar as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 315.

316. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 316.

317. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 317.

318. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 318.

319. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 319.

320. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 320.

321. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 321.

322. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 322.

323. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 323.

324. MWL admits that Abdullah al Obaid is an officer of the MWL entity in Virginia. MWL denies that Hassan A.A. Bahfzallah and Yaqub M. Mirza are officers and directors of MWL. MWL denies that Al Obaid is the Secretary General of the MWL worldwide. MWL denies that Rabita Trust is “MWL’s Pakistan branch.” MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 324.

325. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 325.

326. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 326.

327. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 327.

328. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 328.

329. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 329.

330. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 330.

331. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 331.

332. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 332.

THE SAAR FOUNDATION

333. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 333.

334. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 334.

335. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 335.

336. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 336.

337. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 337.

338. MWL denies the allegations in paragraph 338 insofar as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 338.

339. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 339.

340. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 340.

341. MWL denies the allegations in paragraph 341 insofar as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 341.

342. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 342.

343. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 343.

344. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 344.

345. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 345.

346. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 346.

347. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 347.

348. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 348.

349. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 349.

350. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 350.

351. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 351.

352. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 352.

353. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 353.

354. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 354.

355. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 355.

THE GLOBAL RELIEF FOUNDATION

356. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 356.

357. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 357.

358. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 358.

359. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 359.

360. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 360.

361. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 361.

362. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 362.

363. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 363.

364. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 364.

365. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 365.

366. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 366.

367. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 367.

368. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 368.

369. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 369.

370. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 370.

371. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 371.

372. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 372.

373. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 373.

TAIBAH INTERNATIONAL AID ASSOCIATION

374. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 374.

375. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 375.

376. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 376.

377. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 377.

378. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 378.

379. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 379.

380. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 380.

381. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 381.

382. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 382.

383. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 383.

384. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 384.

385. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 385.

BENEVOLENCE INTERNATIONAL FOUNDATION, INC AND
BATTERJEE

386. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 386.

387. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 387.

388. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 388.

389. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 389.

390. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 390.

391. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 391.

392. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 392.

393. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 393.

394. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 394.

395. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 395.

396. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 396.

397. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 397.

398. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 398.

399. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 399.

400. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 400.

401. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 401.

402. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 402.

403. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 403.

404. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 404.

405. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 405.

406. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 406.

407. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 407.

408. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 408.

409. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 409.

410. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 410.

411. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 411.

412. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 412.

413. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 413.

414. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 414.

415. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 415.

416. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 416.

417. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 417.

418. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 418.

419. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 419.

420. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 420.

421. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 421.

422. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 422.

423. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 423.

424. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 424.

425. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 425.

426. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 426.

427. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 427.

428. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 428.

429. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 429.

430. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 430.

431. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 431.

432. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 432.

433. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 433.

434. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 434.

435. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 435.

436. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 436.

437. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 437.

438. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 438.

439. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 439.

440. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 440.

441. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 441.

442. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 442.

443. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 443.

444. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 444.

445. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 445.

THE SAUDI HIGH COMMISSION

446. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 446.

447. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 447.

448. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 448.

449. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 449.

450. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 450.

451. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 451.

452. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 452.

453. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 453.

454. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 454.

455. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 455.

456. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 456.

457. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 457.

MUWAFFAQ-BLESSED RELIEF: AL QADI AND BIN MAHFOUZ

458. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 458.

459. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 459.

460. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 460.

461. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 461.

462. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 462.

463. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 463.

464. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 464.

465. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 465.

AL-HARAMAIN

466. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 466.

467. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 467.

468. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 468.

469. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 469.

**AL HARAMAIN'S HUMANITARIAN EFFORTS
USED TO CONCEAL SUPPORT FOR AL QAEDA**

470. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 470.

471. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 471.

472. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 472.

473. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 473.

474. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 474.

475. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 475.

476. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 476.

477. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 477.

478. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 478.

**AL-HARAMAIN'S TIES TO AL QAEDA'S
1998 UNITED STATES EMBASSY BOMBINGS**

479. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 479.

480. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 480.

481. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 481.

482. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 482.

483. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 483.

484. MWL denies the allegations in paragraph 484 insofar as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 484.

485. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 485.

486. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 486.

487. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 487.

488. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 488.

489. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 489.

490. MWL does not possess sufficient information to admit or deny the allegations contained in this paragraph.

491. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 491.

492. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 492.

493. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 493.

MERCY INTERNATIONAL RELIEF AGENCY

494. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 494.

495. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 495.

496. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 496.

497. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 497.

498. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 498.

499. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 499.

500. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 500.

501. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 501.

502. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 502.

503. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 503.

IBRAHIM BIN ABDUL AZIZ AL IBRAHIM FOUNDATION

504. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 504.

505. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 505.

506. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 506.

507. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 507.

508. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 508.

509. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 509.

510. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 510.

511. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 511.

512. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 512.

513. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 513.

514. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 514.

515. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 515.

516. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 516.

517. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 517.

518. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 518.

AFGHAN SUPORT COMMITTEE (ASC)

519. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 519.

AL WAFI

520. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 520.

RABITA TRUST

521. MWL admits that it founded Rabita Trust with the Pakistani Government. MWL denies any “involve[ment] with Terrorism.”

522. MWL admits that it assisted with initial funding of Rabita Trust. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 522.

523. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 523.

524. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 52.

525. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 525.

526. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 526.

527. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 527.

528. MWL denies the allegations of paragraph 528 insofar as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 528.

AL RASHID TRUST

529. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 529.

THE MUSLIM BROTHERHOOD

530. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 530.

531. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 531.

532. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 532.

533. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 533.

534. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 534.

535. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 535.

536. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 536.

537. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 537.

538. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 538.

539. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 539.

540. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 540.

SAUDI BIN LADEN GROUP

541. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 541.

542. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 542.

543. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 543.

544. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 544.

545. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 545.

546. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 546.

547. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 547.

548. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 548.

549. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 549.

550. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 550.

551. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 551.

552. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 552.

553. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 553.

554. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 554.

555. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 555.

556. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 556.

557. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 557.

558. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 558.

AL RAJHI BANK

559. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 559.

560. MWL denies the allegations in paragraph 560 insofar as they relate to MWL. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 560.

561. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 561.

562. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 562.

NATIONAL COMMERCIAL BANK AND BIN MAHFOUZ

563. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 563.

564. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 564.

565. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 565.

566. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 566.

567. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 567.

568. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 568.

569. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 569.

570. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 570.

571. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 571.

572. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 572.

573. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 573.

574. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 574.

575. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 575.

576. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 576.

577. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 577.

578. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 578.

579. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 579.

DAR AL MAAL AL ISLAMI

580. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 580.

581. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 581.

582. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 582.

AL BARAKA INVESTMENT AND DEVELOPMENT CORP.

583. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 583.

584. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 584.

585. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 585.

586. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 586.

587. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 587.

588. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 588.

589. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 589.

590. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 590.

591. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 591.

592. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 592.

593. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 593.

594. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 594.

595. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 595.

596. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 596.

597. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 597.

598. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 598.

599. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 599.

600. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 600.

601. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 601.

AL-BARAKAAT AND JUMALE

602. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 602.

SAUDI AMERICAN BANK

603. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 603.

604. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 604.

605. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 605.

606. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 606.

607. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 607.

608. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 608

609. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 609.

SHAYKH SAI'D

610. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 610.

611. MWL does not possess sufficient information to admit or deny the allegations contained in paragraph 611.

COUNT ONE

WRONGFUL DEATH ON INTENTIONAL MURDER

612. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

613. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

614. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

615. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

616. The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT TWO

SURVIVAL DAMAGES BASED ON INTENTIONAL MURDER

602. [sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

603.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

604. [sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT THREE

ASSAULT AND BATTERY

605.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

606.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

607.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT FOUR

VIOLATION OF ANTI-TERRORISM ACT, 18 U.S.C. § 2333

608.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

609.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

610.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT FIVE

TORTURE VICTIM PROTECTION ACT

611.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

612.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

613.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

614.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT SIX

ANTI TERRORISM AND EFFECTIVE DEATH PENALTY ACT CLAIM, 28 U.S.C. § 1605(A)(7) – IRAQ, IRAN AND THE SUDAN

615.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

616.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

617.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

618.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

619.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

620.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT SEVEN

PUNITIVE DAMAGES

621.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

622.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

COUNT EIGHT

PROPERTY DAMAGE

623.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

624.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

625.[sic] The allegations of this paragraph constitute a conclusion of law to which no response is required. To the extent a response is required, the allegations are denied.

FIRST AFFIRMATIVE DEFENSE

(Failure to State a Claim)

Plaintiffs' claims fail to state a claim against MWL for which relief may be granted.

SECOND AFFIRMATIVE DEFENSE

(Causation)

There is no causal connection between any of MWL's activities and plaintiffs' injuries.

THIRD AFFIRMATIVE DEFENSE

(Causation)

No act or omission of any agent, servant, or employee of MWL proximately caused any harm or damages to plaintiffs.

FOURTH AFFIRMATIVE DEFENSE

(Causation)

MWL's activities were not the proximate cause of any harm or damages to plaintiffs.

FIFTH AFFIRMATIVE DEFENSE

(Other Tortfeasors)

Plaintiffs' damages and injuries were caused by other individuals or entities who are, or are not, named as parties to this action.

SIXTH AFFIRMATIVE DEFENSE

(Improper Venue)

This Court is not the proper venue for plaintiffs' claims against MWL.

SEVENTH AFFIRMATIVE DEFENSE

(Subject Matter Jurisdiction)

This Court does not have subject matter jurisdiction over plaintiffs' claims against MWL.

EIGHTH AFFIRMATIVE DEFENSE

(Personal Jurisdiction)

This Court does not have personal jurisdiction over plaintiffs' claims against MWL.

NINTH AFFIRMATIVE DEFENSE

(Estoppel)

Plaintiffs are estopped from receiving the relief requested against MWL.

TENTH AFFIRMATIVE DEFENSE

(Statute of Limitations)

Plaintiffs' claims against MWL are barred, in whole or in part, by the applicable statute of limitations.

ELEVENTH AFFIRMATIVE DEFENSE

(Punitive Damages)

Plaintiffs' claims for punitive damages against MWL are barred because MWL's activities, as alleged by plaintiffs, were not committed with intent, malice, willful and outrageous conduct aggravated by evil motive, or reckless indifference, and none of MWL's activities in any way were intended to, or did harm, the plaintiffs in this action.

TWELFTH AFFIRMATIVE DEFENSE

(No Double Recovery)

Plaintiffs' claims for compensatory and punitive damages are barred to the extent that some plaintiffs are also seeking recovery against MWL, for the same or similar claims, in the civil actions comprising the multi-district litigation entitled *In re Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (RCC), pending in the United States District Court for the Southern District of New York.

THIRTEENTH AFFIRMATIVE DEFENSE

MWL is an instrumentality of the government of the Kingdom of Saudi Arabia. Accordingly, MWL is immune from suit.

FOURTEENTH AFFIRMATIVE DEFENSE

The Central Intelligence Agency, The Federal Bureau of Investigation, and other agencies of the United States government had information and resources to prevent the September 11, 2001, attacks from occurring. But for their failure to utilize this information and these resources, MWL would not be a named defendant in this action.

FIFTEENTH AFFIRMATIVE DEFENSE

In response to plaintiffs' claims, MWL intends to invoke any other defense, including affirmative defenses, as they may become apparent through discovery, and reserve the right, in accordance with the Federal Rules of Civil Procedure and the Local Civil Rules of the United States District Court for the District of Columbia, to assert such defenses.

MWL requests that the Plaintiffs' Third Party Amended Complaint be dismissed with prejudice as to MWL, and that the Court award attorney's fees and costs to MWL in

defending against a case with no factual or legal basis against MWL, and award any other relief that the Court deems just under the circumstances.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

MDL No. 1570 (RCC)

This document relates to:

KATHLEEN ASHTON, et al,
Plaintiffs

02 CV 6977 (RCC)

v.

AL QAEDA ISLAMIC ARMY, et al,
Defendants

MUSLIM WORLD LEAGUE,
Cross-claimant,

v.

KHALID SHEIK MOHAMMED,
Cross-Defendant.

**CROSS-CLAIM AGAINST
DEFENDANT KHALID SHEIK MOHAMMED**

Comes now Defendant Muslim World League (“MWL”) and, through undersigned counsel, hereby cross-claims against Defendant Khalid Sheik Mohammed, in connection with the events detailed in the Third Amended Complaint (“Complaint”), as follows:

1. MWL is named in the Complaint as a Defendant and, thus, is subject to a potential judgment being entered against it in the sum of One Trillion Dollars.
2. MWL, *inter alia*, has been accused of financing the 9/11 tragedy.

3. MWL has answered the Complaint and has denied any involvement in the financing of the 9/11 tragedy.

FIRST CAUSE OF ACTION
INDEMNIFICATION

4. Cross-claimant MWL hereby repeats and realleges paragraphs one through three, as if fully recited herein.
5. Based upon the complaint, Defendant Khalid Sheik Mohammed aided, abetted, materially supported and conspired with al Qaeda to carry out the attacks of September 11, 2001.
6. Based upon numerous reputable new sources quoting law enforcement authorities and the statements of President George W. Bush, Defendant Khalid Sheik Mohammed was “the mastermind of the September 11th attacks.”
7. Thus, Defendant Khalid Sheik Mohammed is responsible to the plaintiffs in this case since his conduct is and was the proximate cause of the injuries pled herein.
8. If, as plaintiffs allege, monies from MWL were somehow used in the attacks of September 11, it was without the knowledge of MWL and contrary to the best efforts of MWL to prevent such from happening.
9. If, as plaintiffs allege, monies from MWL were somehow used in the attacks of

September 11: (a)it was without the knowledge of MWL, (b)contrary to the best efforts of MWL to prevent such from happening, and (c) totally incompatible with its charitable mission.

10. Therefore, if MWL should be held liable for the actions of Defendant Khalid Sheik Mohammed, actions which MWL did not condone, support, have knowledge of, aid, abet, or conspire to cause, then MWL is entitled to recover from Defendant Khalid Sheik Mohammed for all sums adjudged herein against MWL.

WHEREFORE, Defendant MWL requests judgment to be entered herein against Defendant Khalid Sheik Mohammed in the exact amount of any judgment entered herein against MWL.

Respectfully submitted,

Martin F. McMahon (MM 4389)
Martin McMahon & Associates
1150 Connecticut Ave., N.W.
Ste. 900
Washington, D.C. 20036
(202) 862-4343

*Attorneys for Defendant
Muslim World League*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

MDL No. 1570 (RCC)

This document relates to:

KATHLEEN ASHTON, et al,
Plaintiffs,

02 CV 6977 (RCC)

v.

AL QAEDA ISLAMIC ARMY, et al.,
Defendants.

MUSLIM WORLD LEAGUE,
Cross-Claimant,

v.

MUSTAFA AHMED AL-HAWSAWI
Cross-Defendant.

**CROSS-CLAIM AGAINST
DEFENDANT MUSTAFA AHMED AL-HAWSAWI**

Comes now Defendant Muslim World League (“MWL”) and, through undersigned counsel, hereby cross-claims against Defendant Mustafa Ahmed Al-Hawsawi, in connection with the events detailed in the Third Amended Complaint (“Complaint”), as follows:

1. MWL is named in the Complaint as a Defendant and, thus, is subject to a potential judgment being entered against it in the sum of One Trillion Dollars.
2. MWL, *inter alia*, has been accused of financing the 9/11 tragedy.

3. MWL has answered the Complaint and has denied any involvement in the financing of the 9/11 tragedy.

FIRST CAUSE OF ACTION
INDEMNIFICATION

4. Cross-claimant MWL hereby repeats and realleges paragraphs one through three, as if fully recited herein.
5. Based upon the complaint, Defendant Mustafa Ahmed Al-Hawsawi aided, abetted, materially supported and conspired with al Qaeda to carry out the attacks of September 11, 2001.
6. Based upon the complaint, Defendant Mustafa Ahmed Al-Hawsawi transferred funds to the hijackers who carried out the attacks of September 11, 2001.
7. Based upon the complaint, Defendant Mustafa Ahmed Al-Hawsawi was the “paymaster” of the attacks of September 11, 2001.
8. Thus, Defendant Mustafa Ahmed Al-Hawsawi is responsible to the plaintiffs in this case since his conduct is and was the proximate cause of the injuries pled herein.
9. If, as plaintiffs allege, monies from MWL were somehow used in the attacks of September 11: (a) it was without the knowledge of MWL, (b) contrary to the best

efforts of MWL to prevent such from happening, and (c) totally incompatible with its charitable mission.

10. If, as plaintiffs allege, monies from MWL were used in the attacks of 9/11, Defendant Mustafa Ahmed Al-Hawsawi was instrumental in siphoning such funds from MWL and using them in a way which he knew was counter to MWL's intended purpose.

11. Therefore, if MWL should be held liable for the actions of Defendant Mustafa Ahmed Al-Hawsawi, actions which MWL did not condone, support, have knowledge of, aid, abet, or conspire to cause, then MWL is entitled to recover from Defendant Mustafa Ahmed Al-Hawsawi for all sums adjudged herein against MWL.

WHEREFORE, Defendant MWL requests judgment to be entered herein against Defendant Mustafa Ahmed Al-Hawsawi in the exact amount of any judgment entered herein against MWL.

Respectfully submitted,

Martin F. McMahon (MM 4389)
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*Attorneys for Defendant
Muslim World League*

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE TERRORIST ATTACKS ON
SEPTEMBER 11, 2001

MDL No. 1570 (RCC)

This document relates to:

KATHLEEN ASHTON, et al,
Plaintiffs,

02 CV 6977 (RCC)

v.

AL QAEDA ISLAMIC ARMY, et al.,
Defendants.

MUSLIM WORLD LEAGUE,
Cross-Claimant,

v.

RAMZI BINALSHIBH,
Cross-Defendant.

**CROSS-CLAIM AGAINST
DEFENDANT RAMZI BINALSHIBH**

Comes now Defendant Muslim World League (“MWL”) and, through undersigned counsel, hereby cross-claims against Defendant Ramzi Binalshibh, in connection with the events detailed in the Third Amended Complaint (“Complaint”), as follows:

1. MWL is named in the Complaint as a Defendant and, thus, is subject to a potential judgment being entered against it in the sum of One Trillion Dollars.
2. MWL, *inter alia*, has been accused of financing the 9/11 tragedy.

3. MWL has answered the Complaint and has denied any involvement in the financing of the 9/11 tragedy.

FIRST CAUSE OF ACTION
INDEMNIFICATION

4. Cross-claimant MWL hereby repeats and realleges paragraphs one through three, as if fully recited herein.
5. Based upon the complaint, Defendant Ramzi Binalshibh aided, abetted, materially supported and conspired with al Qaeda to carry out the attacks of September 11, 2001.
6. Based upon the complaint, Defendant Ramzi Binalshibh assisted terrorist in Hamburg, Germany who later carried out the attacks of September 11, 2001.
7. Based upon the complaint, Defendant Ramzi Binalshibh handled the logistics and finances of the attacks of September 11, 2001.
8. Thus, Defendant Ramzi Binalshibh is responsible to the plaintiffs in this case since his conduct is and was the proximate cause of the injuries pled herein.
9. If, as plaintiffs allege, monies from MWL were somehow used in the attacks of September 11: (a)it was without the knowledge of MWL, (b)contrary to the best

efforts of MWL to prevent such from happening, and (c) totally incompatible with its charitable mission.

10. If, as plaintiffs allege, monies from MWL were used in the attacks of 9/11, Defendant Ramzi Binalshibh was instrumental in siphoning such funds from MWL and using them in a way which he knew was counter to MWL's intended purpose.

11. Therefore, if MWL should be held liable for the actions of Defendant Ramzi Binalshibh, actions which MWL did not condone, support, have knowledge of, aid, abet, or conspire to cause, then MWL is entitled to recover from Defendant Ramzi Binalshibh for all sums adjudged herein against MWL.

WHEREFORE, Defendant MWL requests judgment to be entered herein against Defendant Ramzi Binalshibh in the exact amount of any judgment entered herein against MWL.

Respectfully submitted,

Martin F. McMahon (MM 4389)
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